

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DIGIMEDIA TECH, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-227 (MN)
)	
LENOVO (UNITED STATES) INC., and)	
MOTOROLA MOBILITY LLC,)	
)	
Defendants.)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to D.I. 31 and 49, the parties provide this Joint Claim Construction Chart.

The following abbreviations are used throughout: U.S. Patent No. 6,473,532 (the “532 Patent”); U.S. Patent No. 6,744,818 (the “818 Patent”); U.S. Patent No. 6,684,220 (the “220 Patent”); U.S. Patent No. 6,545,706 (the “706 Patent”); U.S. Patent No. 7,715,476 (the “476 Patent”); U.S. Patent No. 6,606,287 (the “287 Patent”); and U.S. Patent No. 6,567,086 (the “086 Patent”).

The parties have not agreed upon any constructions.

The parties dispute the constructions of the following claim terms:

No.	Claim Term	DigiMedia's Proposed Construction	DigiMedia's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
1	<p>“A method of visual lossless encoding of frames of a video signal, the method comprising steps of:”</p> <p>(’532 Patent, Claim 6)</p>	Preamble is <i>not</i> limiting	2:22-67; 3:1-4:24; 4:26-14:34; 12:50-63.	Preamble is limiting	Claim 6; 2:25-28; 2:44-46; 3:1-11; 3:17-49; 4:9-16; 5:26-33; 5:66-6:12.
2	<p>“detail[s]”</p> <p>(’532 Patent, Claim 6)</p>	Plain and ordinary meaning	Abstract; 2:35-42; 2:52-60; 3:1-16; 4:9-19; 4:35-36 and Fig. 2; 4:65-10:19 11:24-60; 12:9-26; 12:51-67; 14:19-28.	“pixel[s]”	2:31-43; 3:20-49; 3:52-60; 3:66-4:4; 6:14-21; 6:35-7:2; 7:10-17; 7:10-8:53; 9:27-35; 10:41-42.
3	<p>“spatially and temporally separating and analyzing”</p> <p>(’532 Patent, Claim 6)</p>	Plain and ordinary meaning	3:1-16; 5:66-6:12; 12:50-67; 6:22-24.	“spatially and temporally separating and spatially and temporally analyzing”	3:11-14; 5:66-6:13; 6:30-34; Figure 4.
4	<p>“visual lossless encoding”</p> <p>(’532 Patent, Claim 6)</p>	Plain and ordinary meaning	Abstract; 2:22-67; 3:1-11; 4:31-36 and Fig. 2; 5:34-65; 12:9-26; 12:50-63.	Indefinite.	4:31-36; 2:23-24; 3:1-3, Figure 2, Figure 3.
5	<p>“frame picture details”</p>	Plain and ordinary meaning	3:1-11; 4:61-5:14; 7:5-9:42; 12:50-63.	Indefinite.	3:3-11; 5:1-14.

	('532 Patent, Claim 6)				
6	<p>“a visual perception estimator adapted to estimate a perception threshold for a pixel of a current frame of a videostream”</p> <p>('818 Patent, Claim 1)</p>	Plain and ordinary meaning; not indefinite; not subject to Section 112, paragraph 6	Abstract; Figs. 1, 2, 4, 11; 1:63-4:45; 9:49-60.	<p>Subject to 35 U.S.C. § 112, Paragraph 6.</p> <p><i>Function:</i> estimating a perception threshold for a pixel of a current frame of a videostream</p> <p><i>Structure:</i> none</p> <p>Indefinite.</p>	Abstract; 2:4-11; Figure 1, Figure 11.
7	<p>“a pixel of a current frame of a videostream”</p> <p>('818 Patent, Claim 1)</p>	Plain and ordinary meaning	Abstract; 1:63-2:7; 4:6-10; 4:39-45; 9:49-60.	“each ith pixel of a current frame of a videostream”	2:4-11; 2:12-17; 2:18-29.
8	<p>“a compression dependent threshold estimator adapted to estimate a compression dependent threshold for said pixel at least from said perception</p>	Plain and ordinary meaning; not indefinite; not subject to Section 112, paragraph 6	Abstract; Figs. 1, 2, 4, 11; 1:63-4:45; 9:49-60.	<p>Subject to 35 U.S.C. § 112, Paragraph 6.</p> <p><i>Function:</i> estimating a compression dependent threshold for said pixel at least from said perception threshold and information from said encoder</p> <p><i>Structure:</i> algorithm</p>	Abstract; Figure 1, Figure 2, Figure 11; 1:31-33; 2:43-3:2; 3:7-13; 2:64-65; 3:53-55.

	threshold and information from said encoder” (’818 Patent, Claim 1)			(mathematical equation) disclosed at 3:7-13	
9	“information” [from said encoder] (’818 Patent, Claim 1)	Plain and ordinary meaning	Fig. 1 and 2; 2:12-4:45.	“current frame type and/or encoder buffer capacity” [from said encoder]	2:15-18; 2:37-42; 2:50-51; 2:64-65; 3:53-55; 4:1-5.
10	[Filter unit adapted to filter said pixel at least] “according to said compression dependent threshold” (’818 Patent, Claim 1)	Plain and ordinary meaning	Abstract; Fig. 2; 1:63-5:64; 9:3-36.	[Filter unit adapted to filter said pixel at least] “based on the value of said compression dependent threshold for said pixel”	2:18-24; 5:45-56; 5:56-64; 7:20-8:22.
11	“automatically” (’220 Patent, Claims 1 and 22)	Plain and ordinary meaning.	<i>Passim</i>	“without user action or interaction”	3:38-40; DEM(Len)000825-000838, DEM(Len)000851-000858; DEM(Len)000860-000872.
12	“each” (’220 Patent,	Plain and ordinary meaning.	<i>Passim</i>	“every one of at least a subset”	3:36-37.

	Claims 1 and 22)				
13	“objects” (’220 Patent, Claims 1-3, 6, and 22)	Plain and ordinary meaning.	<i>Passim</i>	“identifiable, encapsulated code and data that provide one or more services when requested by a user”	Figure 4A; Figure 4B; 3:24-40; 3:40-55; 4:17- 5:17.
14	“head portion” (’706 Patent, Claims 19-24; ’476 Patent, Claims 1-5)	Plain and ordinary meaning.	Abstract; Fig. 3; Fig. 6; Fig. 9; Fig. 10; Fig. 13 ¹ ; 1:41-53; 1:54-62; 2:2-11; 2:16-18; 2:19-29; 2:30- 40; 2:41-48; 2:53-2:61; 2:62-3:4; 3:5-13; 3:14- 3:23; 3:38-47; 3:56-60; 4:40-50; 5:13-32; 5:33- 50; 5:51-55; 6:1-10; 6:55-57; 6:66-7:8; 7:9- 35; 7:36-47; 7:48-57; 7:58-65; 7:66-8:10; 8:11- 21; 8:22-30; 8:46-63; 8:64-9:11; 9:23-30; 9:60- 10:10; 10:40-54; 10:55- 60; 10:61-11:1; 11:5-20; 11:30-14:53. ² ’476 Patent Prosecution History: April 22, 2009, Response to Office Action at 11-12;	“head of a person, rather than components of the head”	2:32-41; 2:64-3:33; 6:66-7:8; 7:35-45; Figure 5, Figure 7, DM(Len)0001419- 0001431; DM(Len)0001439- 14449; DM(Len)0001454- 0001462; DM(Len)0001469- 0001482; DM(Len)0001501- 0001521; DM(Len)00015333- 0001544; DM(Len)0001550- 0001551. Patent Owner’s Response, <i>Unified Patents, LLC v. Digimedia Tech. LLC</i> , IPR2021-0076, Dkt. No. 10 (Aug. 6, 2021).

¹ Citation to figures also includes passages discussing or referencing those figures.

² These citations are to the ’476 patent. The ’706 patent shares a common specification with the ’476 patent and Plaintiff cites the corresponding passages from the ’706 patent.

			September 21, 2009, Response to Office Action at 12-14; October 12, 2009 Response to Office Action at 12-14.		Patent Owner's Sur-Reply, <i>Unified Patents, LLC v. Digimedia Tech. LLC</i> , IPR2021-0076, Dkt. No. 13, (Dec. 1, 2021).
15	“an unacceptable loss of quality” (’287 Patent, Claims 1, 4, and 8)	Plain and ordinary meaning.	Fig. 4, 7; 3:66-4:9; 4:28-46.	Indefinite.	Figure 7; 4:4-9; 4:37–39.
16	“a generator configured to generate one or more data items wherein said data items are associated with a media signal” (’287 Patent, Claim 4)	Plain and ordinary meaning; not indefinite; not subject to Section 112, paragraph 6	2:50-67; 4:21-4:27, Fig. 6.	Subject to 35 U.S.C. § 112, Paragraph 6 <i>Function:</i> generating one or more data items wherein said data items are associated with a media signal <i>Structure:</i> none Indefinite.	2:50-67.
17	“a determiner configured to determine a maximum compression rate from said data items wherein recording said	Plain and ordinary meaning; not indefinite; not subject to Section 112, paragraph 6	4:58-67, Fig. 9.	Subject to 35 U.S.C. § 112, Paragraph 6 <i>Function:</i> determining a maximum compression rate from said data items wherein recording said media signal	3:56-57; 4:41-27; 4:50-51; 4:63–64.

	media signal compressed at said maximum compression rate does not result in an unacceptable loss of quality of said media signal” (’287 Patent, Claim 4)			compressed at said maximum compression rate does not result in an unacceptable loss of quality of said media signal <i>Structure:</i> none Indefinite.	
18	“An immersive video system for displaying a view window of an environment, the immersive video system comprising:” (’086 Patent, Claim 1)	Preamble is <i>not</i> limiting	<i>Passim</i>	Preamble is limiting.	Claim 1; 1:15-3:40; 8:5-9:55.
19	“A method of displaying a view window of an environment from a plurality of video streams, wherein each video stream includes environment	Preamble is <i>not</i> limiting	<i>Passim</i>	Preamble is limiting.	Claim 24; 1:15-3:40; 8:5-9:55.

	data for recreating different viewable ('086 Patent, Claim 24)				
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